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Loan No. xxxxxx3920 / Our File No. 12-03-39857-NV

Attorney for Secured Creditor
Deutsche Bank National Trust Company, as Trustee for GSAA Home Equity Trust 2006-8, Asset-Backed Certificates, Series 2006-8

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

NICOLAS LARA
RITA LARA

Debtor(s)

CHAPTER 13
BANKRUPTCY NO.: 12-11954-MKN
DATE: May 17, 2012
TIME: 01:30 PM

**AMENDED OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER
13 PLAN WITH CERTIFICATE OF SERVICE**

Deutsche Bank National Trust Company, as Trustee for GSAA Home Equity Trust 2006-8, Asset-Backed Certificates, Series 2006-8 is a Secured Creditor in the above-entitled bankruptcy proceeding and hereby submits the following Objections to the Confirmation of that certain Chapter 13 Plan proposed by Debtors.

1. This objecting Creditor holds a security interest in the form of a First deed of trust on the property located at 632 Lincoln Road, Las Vegas, NV 89110.
2. As of the filing date of the instant bankruptcy petition on February 23, 2012, the amount in default pre-petition was \$3,787.19; representing Three (3) monthly payments, late charges, NSF charges (if any); advances for taxes and insurance (if any); and any foreclosure or Trustee's fees accrued with respect to the default.

1 3. The plan does not currently set forth the necessary amount for plan payment and does not
2 propose to pay the arrearages to Deutsche Bank National Trust Company, as Trustee for GSAA
3 Home Equity Trust 2006-8, Asset-Backed Certificates, Series 2006-8 in a reasonable manner.

4 4. The Debtors are currently in contravention of 11 U.S.C. § 1322(b)(5) and the plan should
5 not be confirmed as proposed.

6 Any plan proposed by the Debtors must accommodate the necessary pre-petition arrearages as
7 reflected above in order to be reasonable and correct. Additionally, any plan proposed by the
8 Debtor should provide that payments to Deutsche Bank National Trust Company, as Trustee for
9 GSAA Home Equity Trust 2006-8, Asset-Backed Certificates, Series 2006-8 begin as expediently
10 as possible and that the pre-petition arrearages be paid in their entirety prior to the expiration of
11 sixty months.

12 WHEREFORE, Secured Creditor prays as follows:

13
14 (1) That confirmation of the proposed Chapter 13 plan be denied unless the above-
15 referenced numbers can be accommodated;

16 (2) For attorneys fees and costs incurred herein;

17 (3) For dismissal of the Chapter 13 proceeding;

18 (4) For any and all other relief that this Court deems appropriate.

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Attorneys for Secured Creditor
21 **Deutsche Bank National Trust Company**
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CERTIFICATE OF SERVICE

The undersigned hereby declares and certifies that on April 27, 2012, a copy of the Secured Creditors AMENDED OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN WITH CERTIFICATE OF SERVICE was served on the parties through the following means:

Electronically mailed to:

COUNSEL FOR DEBTOR(S)
NARRAH F. NEWARK, ESQ.
BK@nnbklaw.com

TRUSTEE
Kathleen A. Leavitt
courtsecf3@las13.com

Depositing a copy in the United States Mail, postage prepaid and addressed to:

Nicolas Lara, Rita Lara
632 Lincoln Rd.
Las Vegas, NV 89110

I declare under penalty of perjury that the foregoing is true and correct.

/s/ R. DeSimone

An employee of THE COOPER CASTLE LAW FIRM